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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

INTEL CORPORATION, APPLE INC.,

Plaintiffs,

v.

FORTRESS INVESTMENT GROUP LLC,
FORTRESS CREDIT CO. LLC, UNILOC 2017
LLC, UNILOC USA, INC., UNILOC
LUXEMBOURG S.A.R.L., VLSI
TECHNOLOGY LLC, INVT SPE LLC,
INVENTERGY GLOBAL, INC., DSS
TECHNOLOGY MANAGEMENT, INC., IXI
IP, LLC, and SEVEN NETWORKS, LLC,

Defendants.

Case No. 3:19-cv-07651-EMC

**UNOPPOSED ADMINISTRATIVE
MOTION FOR LEAVE TO FILE
RESPONSE TO STATEMENT OF
INTEREST OF THE UNITED STATES**

Hon. Edward M. Chen

1 Plaintiffs Intel Corporation and Apple Inc. file this unopposed administrative motion
2 pursuant to Civil Local Rule 7-11 for leave to file the attached Response to the Statement of
3 Interest of the United States.

4 The Justice Department (the “Department”) filed a twenty-one-page Statement of Interest
5 in support of Defendants’ Motion to Dismiss on March 20, 2020, one day after Plaintiffs filed
6 their Memorandum of Points and Authorities in Opposition to Defendants’ Joint Motion to
7 Dismiss and to Strike Plaintiffs’ Complaint and their Opposition to Defendant DSS Technology
8 Management Inc.’s Supplemental Brief in Support of Defendants’ Joint Motion to Dismiss and
9 to Strike Plaintiffs’ Complaint (collectively, “Opposition Memoranda”). Plaintiffs request leave
10 of Court to file the attached Response, which addresses certain arguments made by the
11 Department that Plaintiffs did not have an opportunity to address in their Opposition
12 Memoranda. Courts regularly grant leave to respond to statements of interest filed by the United
13 States. *See, e.g.,* Order Granting Request By Defendants to File Reply to Statement of Interest of
14 the United States, *Howard Jarvis Taxpayers Ass’n v. Cal. Secure Choice Ret. Sav. Program*, No.
15 2:18-CV-01584-MCE-KJN (E.D. Cal. Sep. 26, 2019); Order Granting Defendants’ Unopposed
16 Administrative Motion for Leave to File Response to Statement of Interest by United States
17 Department of Justice, *Young America’s Found. v. Napolitano*, No. 3:17-CV-02255-MMC (N.D.
18 Cal. Feb. 5, 2018). Plaintiffs asked Defendants and the Department for their positions on this
19 motion, and neither Defendants nor the Department opposes this motion. (Declaration of Mark
20 D. Selwyn ¶¶ 2-5.)

21 Plaintiffs therefore respectfully request that the Court grant Plaintiffs’ motion for leave to
22 file the attached Response to the Statement of Interest of the United States.

1 DATED: April 13, 2020

Respectfully submitted,

2 By: /s/ Mark D. Selwyn

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Attorneys for Plaintiffs
INTEL CORPORATION, APPLE INC.

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on April 13, 2020, I electronically filed the foregoing documents
3 using the CM/ECF system which will send notification of such filing to the e-mail addresses
4 registered in the CM/ECF system, as denoted on the Electronic Mail Notice List.
5

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7 DATED: April 13, 2020

/s/ Mark D. Selwyn

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